


10. LERS inquired into Plaintiff's credit information from TransUnion as part of its reasonable efforts to collect Plaintiff's outstanding Capital One account.
 11. At the time LERS made the credit inquiry from TransUnion, LERS had no reason to believe that the Capital One credit account was not owed by Plaintiff.
 12. The inquiry into Plaintiff's credit information from TransUnion was for no other purpose than to assist LERS with the collection of Plaintiff's Capital One account.
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13. LERS attempted to collect on the account, and the account was subsequently closed in LERS' system.

Under penalties as provided by law, the undersigned certifies that the statements set forth in this instrument are true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 7 day of November, 2012.



Daniel Beam